



October 5, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of The Cleveland Orchestra, located in Cleveland, OH, that provides approximately 150 performances per year locally, nationally, and internationally, to 270,000 audience members and education programs to 20,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. The Cleveland Orchestra inspires and enriches lives by creating extraordinary musical experiences at the highest level of artistic excellence. This mission is supported through our endeavor to perform world class music in innovative ways; being the Orchestra for people of all ages, and by touching every young person in our community with music; providing a fully immersive patron experience; and serving our community in a way that fosters a true love of and passion for music.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

For our many innovative artistic and educational programs, we often include the use of microphones, in-ear communications, cueing and control devices, and equipment controlling

devices to support the programming. The use of these various devices includes microphones for spoken word or live singers, communications for musicians to hear each other on stage, communications for backstage support staff to run shows, microphones for audio recording of performances, amplification and broadcasting of performances to reach broader audiences, providing Audio Listening Devices to the hearing impaired, and offering opportunities for sponsorship recognition.

We regularly work with local vendors to supply all audio and audio-visual equipment, thereby supporting businesses and providing job security. The type of equipment rented often varies depending on the nature of the program.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

As a non-profit organization, every cost increase is detrimental to our ability to continue providing demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. We depend on the generosity of our community and the ability to utilize wireless technology is critical to providing our loyal patrons with an artistic experience at the standards expected of The Cleveland Orchestra.

In general, performing arts organizations also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie H. Kim', with a stylized flourish at the end.

Julie H. Kim
Senior Director of Operations & Facilities
The Cleveland Orchestra